

EXHIBIT B

ROBINS, KAPLAN, MILLER & CIRESI LLP

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ATTORNEYS AT LAW

David E. Marder

March 15, 2007

Via Email and U.S. Mail

David S. Clancy, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
One Beacon Street
Boston, MA 02108-3194

Re: *John J. Vaughn et al. v. Putnam Investment Management, LLC et al.*
USDC Eastern District of Massachusetts C.A. No. 1:04-CV-10988 (GAO)

Dear David:

I write in response to our meet and confer session on March 13 relating to the deposition of Mr. Haldeman. As we discussed, we are not amenable to limiting the length of the deposition or committing to a strictly defined list of topics. We believe that the questioning of Mr. Haldeman should encompass all of the issues in the case, including all of the Gartenberg factors. As I reminded you during our phone call, you represented to the Court that you selected Mr. Haldeman's email for production because he was one of the 11 people at Putnam with the highest level of involvement in the fee setting process.

Based upon our conversation, I understand that you are conferring with your client and will let us know your final position. If you intend to file a Motion for a Protective Order, please file it promptly so that we may get this issue resolved by the Court. If you do not file such a motion, we expect Mr. Haldeman to appear on April 10, 2007, the date of the deposition set forth in the revised notice that is enclosed herewith.

Sincerely,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.



David E. Marder

DEM/lhd
Enclosure

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